

IN THE DRAWINGS

The attached sheet of drawings includes changes to FIGs. 11 and 12. This sheet, which includes FIGs. 11 and 12, replaces the original sheet including FIGs. 11 and 12.

Attachment: Replacement Sheet (1 sheet)

### REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-5 are pending in the present application. Claims 4 and 5 are added by the present amendment.

In the outstanding Office Action, Figures 11 and 12 were objected to; the disclosure was objected to; the Title of the invention was objected to; Claims 1 and 2 were rejected under 35 U.S.C. § 102(b) as anticipated by Tsukada et al. (Japanese Patent Application No. JP 09-223705); and Claim 3 was indicated as allowable if rewritten in independent form.

Applicants thank the Examiner for the indication of allowable subject matter and for the courtesy of an interview extended to Applicants' representative on December 8, 2005. During the interview, clarifying claim amendments were discussed. The Examiner indicated he would further review the amended claims in view of a filed response. However, the amendments discussed with the Examiner during the interview are not presented in this response. Arguments presented during the interview are reiterated below.

Regarding the objection to the drawings, Figures 11 and 12 have been amended as suggested in the outstanding Office Action without adding new matter. Accordingly, it is respectfully requested this objection be withdrawn.

Regarding the objections to the specification and the title, both the specification and the title have been amended based on the suggestions noted in the outstanding Office Action without adding new matter. Accordingly, it is respectfully requested these objections be withdrawn.

The rejection of Claims 1 and 2 under 35 U.S.C. § 102(b) as anticipated by Tsukada is respectfully traversed for the following reasons.

Briefly recapitulating, independent Claim 1 is directed to a semiconductor device having a ground terminal and signal terminals exposed to an outside of a package of the semiconductor device. The ground terminal includes first and second ground terminals isolated from each other. The first ground terminal is electrically connected to a first functional block and the second ground terminal is electrically connected to a second functional block.

Turning to the applied art, Tsukada shows in Figures 4 and 6 a semiconductor device having a substrate support 2 and electrodes 2a and 2b apparently connected to the ground via lead portions 8b and 8c. However, Tsukada clearly shows in Figure 4 that the substrate 2 and the electrodes 2a and 2b are provided completely inside an epoxy resin 11 (package). Further, a lead portion 8a in Tsukada is not disposed around the lead portions 8b and 8c.

Thus, Applicants respectfully submit that Tsukada does not teach or suggest (i) a ground terminal exposed to an outside of a package of the semiconductor device, and (ii) signal terminals arranged around the ground terminal as required by Claim 1.

Accordingly, it is respectfully submitted that independent Claim 1 and each of the claims depending therefrom patentably distinguish over Tsukada.

Regarding Claim 2, the outstanding Office Action states that a second ground terminal surrounds a first ground terminal in Figure 6 of Tsukada. However, while the substrate support 2 is provided under an analog module 4, the substrate support 2 is not provided under a digital module 5 (see Figures 2 and 3 in which the substrate support 2 is provided and Figure 6 in which the support substrate is removed). Therefore, the substrate support 2 connected to the digital module 5 is not shown by Figure 6 of Tsukada.

In addition, while the substrate support 2a surrounds the substrate support 2c in Figure 13, the lead portion 8b does not surround the lead portion 8c. Thus, it is respectfully submitted that Tsukada does not teach or suggest the features of Claim 2.

New Claims 4 and 5 are added to set forth the invention in a varying scope and Applicants submit the new claims are supported by the originally filed specification. More specifically, new Claim 4 recites all the features of Claim 1 and the feature that the second ground electrode **completely surrounds** the first ground electrode as shown in Figure 5. Because Tsukada does not teach or suggest a ground electrode completely surrounding another ground electrode, Applicants respectfully submit that new Claims 4 and 5 patentably distinguish over Tsukada.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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